# Headquarters U.S. Air Force

*I n t e g r i t y - S e r v i c e - E x c e l l e n c e*

# Barrier Analysis
# Made Easy
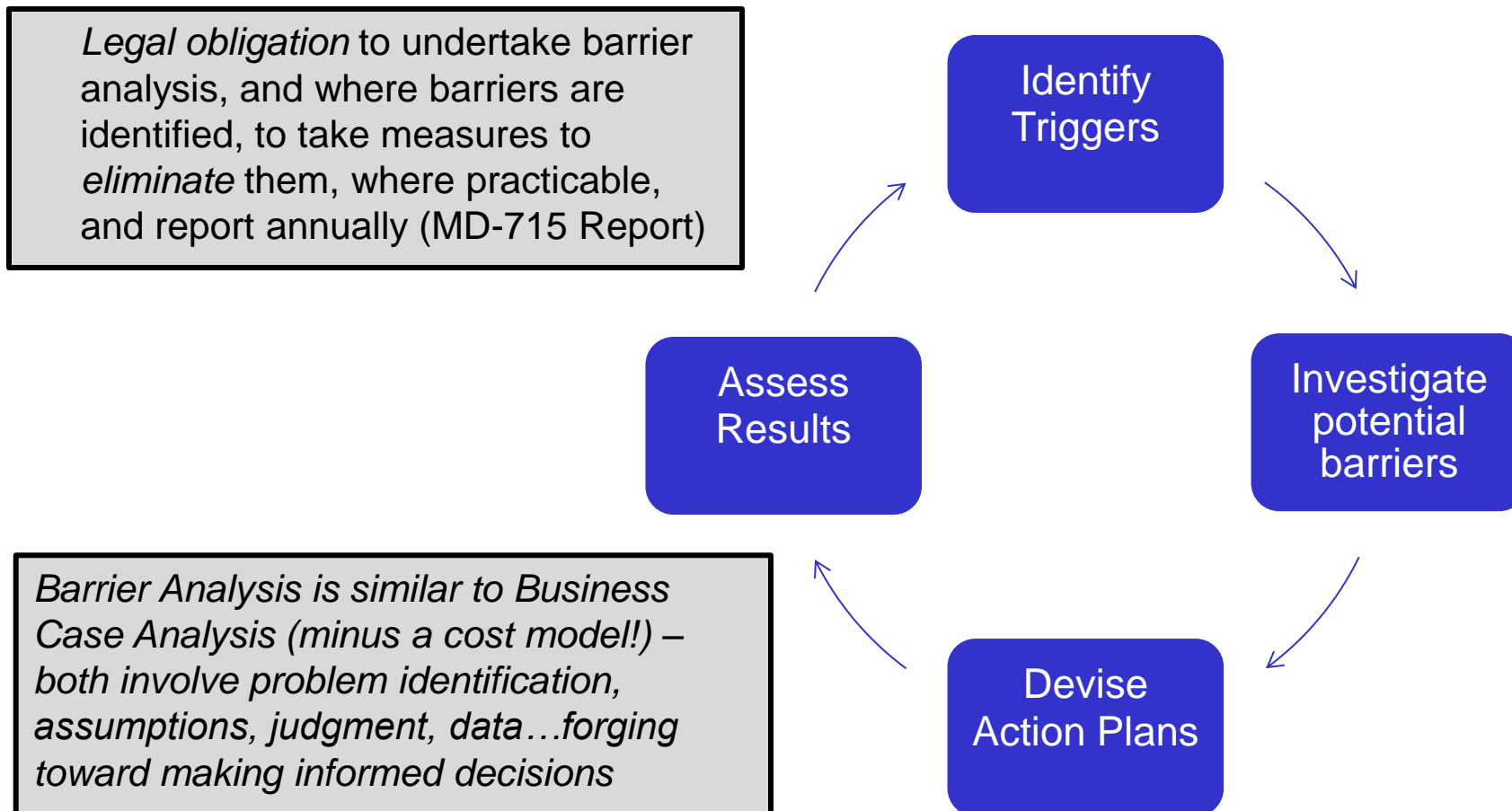
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# *What is Barrier Analysis?*

- **An investigation of anomalies found in workplace policies, procedures, and practices that limit employment opportunities for members of any race or national origin, either sex, or based on an individual's disability status.  Barrier analysis identifies the root causes of those anomalies and determines if they are barriers to equal opportunity.**

- **All federal agencies have a *legal obligation* to undertake barrier analysis; and where barriers are identified, agencies must take measures to eliminate them, where practicable.**

# *Barrier Analysis in a Nutshell*

*Legal obligation* to undertake barrier analysis, and where barriers are identified, to take measures to *eliminate* them, where practicable, and report annually (MD-715 Report)

Identify Triggers

Investigate potential barriers

Devise Action Plans

Assess Results

*Barrier Analysis is similar to Business Case Analysis (minus a cost model!) – both involve problem identification, assumptions, judgment, data…forging toward making informed decisions*

See Chapter 5 of draft  AFI 36-205, *Affirmative Employment Program (AEP), Special Emphasis Programs (SEPs) and Reasonable Accommodation Policy* (to be published in FY2016.)

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- **A trend, disparity, or anomaly that suggests the need for an inquiry into an employment policy, practice, procedure, or condition.**

- **A situation or a 'red flag' that indicates the possible existence of a barrier to equal opportunity.**

Identify Triggers

*Current example of a trigger –*

*Declining percentage of women serving in GS-14 and GS-15 positions*

# *Triggers can be found in:*

- **Workforce statistics**

- **Complaints data**

- **Conversations with EEO and HR staffs**

- **Anecdotes from employees, employees groups, and managers**

- **Results of surveys, focus groups, and exit interviews**

- **Reports by outside organizations**

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- **High separation rate of persons with targeted disabilities**

- **An unusually large number of complaints which raised nonselection as an issue**

- **Anecdotes that Hispanics have experienced workplace hostilities at the hands of coworkers**

- **Results of an exit interview indicating that a significant percentage of blacks identify limited career development opportunities as a reason for leaving**

- **Any employment policy, procedure, practice, or condition that effectively limits employment opportunities for individuals of a particular race, ethnic background or sex, or for individuals with disabilities.**

- **Statistics alone do not establish a barrier.**
  - **They are only evidence that an analysis is needed of *why* there is statistical disparity.**

Investigate potential barriers

# Barriers might be found in:

- Recruitment

- Hiring

- Competitive and career-ladder promotions

- Training and development

- Awards and incentives programs

- Disciplinary Actions

- Separations

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- **Too much discretion given to recruiters**

- **Excessive reliance on a computerized or electronic application process**

- **Stereotypical attitudes about particular groups by those serving on selection panels**

- **Inadequately enforced anti-harassment policies**

- **Widespread failure to properly implement reasonable accommodation procedures**

*Current examples of barriers related to the declining percentage of women in GS-14/15 positions – Geographic Mobility requirement; By Name Requests; Increase in pre-dominantly male external hires; In-Residence PME requirement*

- **Explore possible connections between triggers and employment policies, procedures, practices, and conditions:**
  - **Determine information needed based on preliminary data**
  - **Gather and review information**
  - **Get perspective from knowledgeable individuals**
- **Form a working hypothesis about the barrier that can be tested through an action plan**

# Barrier Analysis Process

- **Determine information needed based on preliminary data:**
  - **Using information gathered from review of workforce statistics, complaints, and other sources, put together lists of information to be gathered and individuals to consult**

- **Keep asking "why" until you have a testable answer**

- **The identification of a barrier is always a working hypothesis**

# *Barrier Analysis Process*

- **Where to look:**
  - **AFIs, guidelines, policy memos, CONOPs**
  - **Records – hiring, promotions, CDE selections, disciplinary actions, complaints**
  - **Organization / function / staffing charts**
  - **Funding & resource documentation**
  - **Plans and mission statements**
  - **Data – statistics and other computations**
  - **Unit / functional accomplishments**

# *Barrier Analysis Process*

- **Consult with knowledgeable individuals**
  - **Officials in charge of programs or organizational segments where triggers were found**
  - **Employees inside and outside unit who are aware of what is going on**
  - **HR and Budget personnel**
  - **Employee groups**

# *Barrier Analysis Process*

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- **The AF Barrier Analysis Working Group**
    - **The AF's primary mechanism for conducting barrier analysis**
    - **Chartered in 2008**
    - **Includes over 40 employees from various levels, functions, and locations**
    - **All volunteers, formally appointed by AF/A1**
    - **Meets quarterly as a group, with monthly team meetings**
    - **Has oversight from AF/A1 (Deputy A1 is the Strategic Director)**
    - **Chaired by the AF EO Director**

- **The AFBAWG carries out its work through 5 teams**
  - **Teams formed to address issues with identified underrepresented groups or specific barriers**
  - **Each team has an AO-level Team Lead and 2 SES Champions**
- **The 5 current teams:**
  - **Disability Program Team**
  - **Career Enhancement Team**
  - **Hispanic Employment Team**
  - **Senior Leader Advancement Team**
  - **Women's Issues Team**

# *Real AFBAWG Example*

- **Identified Trigger: Low participation rate of women at GS-14/15**
  - **Sufficient pipeline of women in mid-level grades**
  - **Promotion data indicates a low number of women selected for these positions**
  - **Review promotion practices, policies and procedures**
  - **Review past selections for GS-14/15 positions:**
    - **Are women applying for positions?**
    - **Are they making it to the certificate of eligibles?**
    - **If not, explore reasons why they are not on the certificate.**
    - **If on certificate, are they being interviewed?**
    - **Interview selecting officials to obtain additional information.**
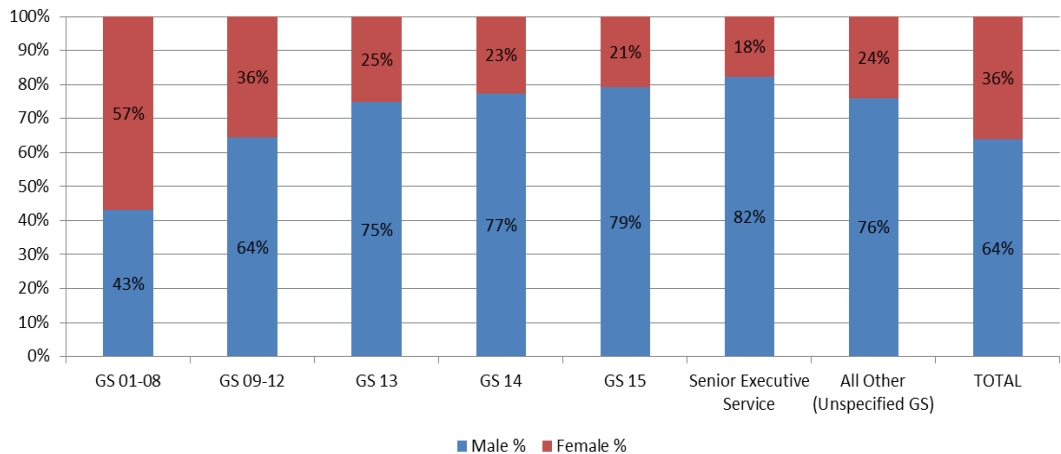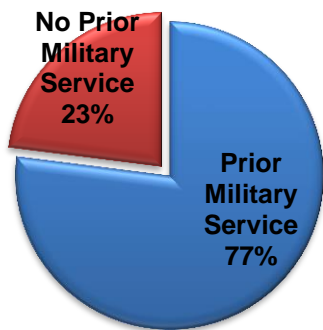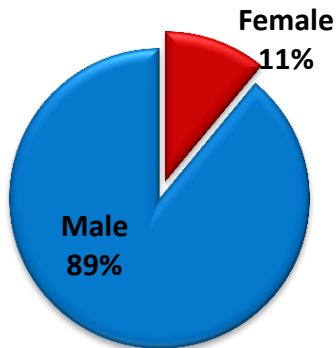  - **Determine if this is an applicant pool issue or a selection issue**

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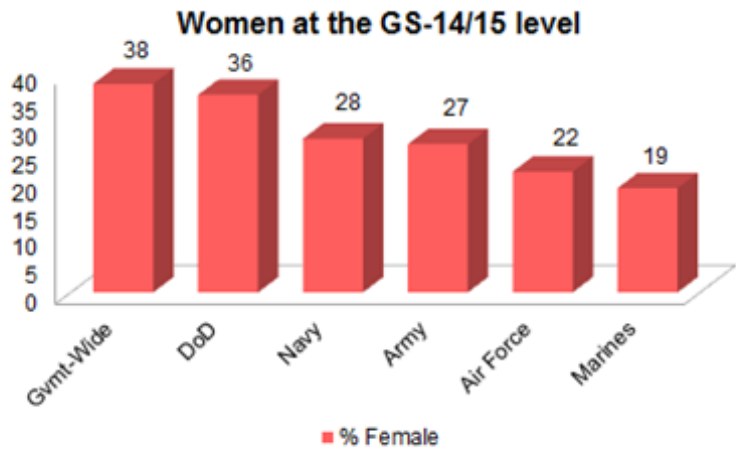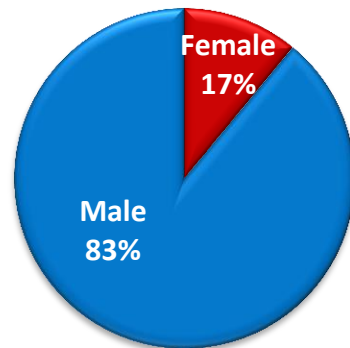
- **Women hold increasingly fewer positions as the grades increase**

- **There is a sufficient pipeline of women in mid-level grades.**

- **Women are recruited in lower numbers than men and are leaving in higher numbers**
  - **In 2008-2012 white females separated at greater rates (25%) than they were hired (17%)**

- **Leading reason women cite for considering leaving the AF in the 2014 Civilian Retention Survey:**
  - **Lack of promotion opportunity**

- **AFAA 2013 Report found that "while the NCLF [National Civilian Labor Force] has become more diverse over the last 10 years, the Air Force civilian workforce has become less diverse"**

- **Clearly state the objective for eliminating the barrier**

- **Establish a target date for barrier elimination and milestones in the process**

  - **Milestones - planned activities to be completed in order to meet the objective of eliminating the barrier**

- **Identify an OPR and hold them accountable**

Devise Action Plans

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**For the example barrier of *declining percentage of women in GS-14/15 positions,* AF leadership has adopted the following initiatives:**

- **Allow By Name Request hires at GS-14/15 level *only* on a by-exception basis, based on mission-critical need**

- **Require the use of hiring panels for all GS-14/15 positions and ensure hiring panels are diverse and include civilians with no prior military experience**

- **Prohibit external-only posting of civilian job announcements**

- **Post all civilian job announcements for a minimum of 5 business days**

- **Change employment selection criteria to replace geographic mobility with breadth and depth of experience and *remove* geographic mobility from the CDE measures of merit**
  - **No mobility will be required following IDE**

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- **Assessment of results from previous reporting cycles, in terms of whether action plan implemented in those earlier years was successful in eliminating barrier**

- **Remember the objective is not proportional representation, it is equality of access, competition and opportunity**

Assess Results

- **Indicators of Success?**

  **Usually mirrors the identified triggers:**
  - **Participation rates up**
  - **Separation rates down**
  - **Drop in EEO complaints**
  - **Survey results indicating improved employee morale**
  - **Favorable responses in exit interviews**
  - **Increased productivity**

- **If the action plan was unsuccessful then**
  - **Potentially wrong barrier was identified;**
  - **The action plan gave rise to a new barrier; or**
  - **There was no barrier**

- **Caveat: results are typically hard to assess after only one reporting cycle**

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- **The laws governing both Military and Civilian employment, as well as admission to education and training programs, do NOT protect just minorities and women**
  - **It is illegal to act based on *any* race/ethnicity or *either* sex**

- **Numerical goals – for hiring, promotion, or admission to any education or  training program – are unconstitutional**

- **AF and Army have lost multiple cases involving selection boards that took race/gender into account**
  - **Cost AF $85 million**

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- **Targeted outreach and recruiting that do not limit admission or benefits by race/gender**

- **Numerical goals for representation in a *pool of applicants***

- **Questioning the race/gender make up of an applicant pool, if lacking in diversity**

- ***Barrier analysis* to determine why minorities or women are underrepresented**

# *Lawful Ways to Promote Diversity*

- **Policies are most likely to survive legal challenge if they meet the following criteria:**
  - **Individualized consideration is the policies' defining feature**
  - **Opportunities to improve are available to all**
  - **"Diversity" is defined beyond traditional EEO categories**
  - **Stereotypical role model assessments and justifications are avoided**
  - **Policies emphasize identifying and removing barriers to equal opportunity**

# *Questions?*



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